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October 23, 2015

Honorable Valerie E. Caproni
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. Sheldon Silver*, No. 15 Cr. 93 (VEC)

Dear Judge Caproni:

As you know, we represent Sheldon Silver in this matter. We write regarding the Motion to Quash the Rule 17(c) Subpoena Duces Tecum (“Subpoena”) that the defense served on non-party Dr. Robert Taub.

Rather than a general “fishing expedition,” the Subpoena seeks documents that are both relevant and admissible. To the extent that Dr. Taub believes that the Subpoena is overly broad, the defense is certainly willing to negotiate its scope with his counsel. Since the Subpoena was served on Dr. Taub through his counsel on October 7, 2015, he has made no attempt to contact us in an effort to informally resolve the issues presented by his Motion to Quash. (The first response to the Subpoena we received was an email today asking us to confirm receipt of his motion.)

We remain willing to discuss the scope of the Subpoena with Dr. Taub’s counsel and will endeavor to do so, in the hopes that the parties can agree as to its scope without burdening the Court.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'J. Shur'.

Justin V. Shur
Steven F. Molo
MoloLamken LLP

cc: all counsel by CM/ECF